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May 23, 2018

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ramona Disposal Services
ATTN: Managing Agent
324 Maple St
Ramona, California 92065

Sandra L. Burr
Registered Agent
JEMCO Equipment Corp.
6670 Federal Boulevard
Lemon Grove, California 91945

Sandra L. Burr
Registered Agent
EDCO Disposal Corporation
6670 Federal Boulevard
Lemon Grove, California 91945

Re: Clean Water Act Notice of Intent to Sue/60-Day Notice Letter
Ramona Disposal Services' Violations of General Industrial Permit

Dear Ms. Burr:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) regarding EDCO Disposal Corporation and JEMCO Equipment Corp. dba Ramona Disposal Services (collectively "RDS") violations of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (Industrial Permit).[1]

This letter constitutes CERF's notice of intent to sue for violations of the Clean Water Act and General Industrial Permit for the RDS facility located 324 Maple Street, Ramona, California (RDS Facility or Facility), as set forth in more detail below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative

[1] On April 1, 2014, the State Water Resources Control Board adopted Order No. 2014-0057-DWQ, which amends the Industrial General Permit ("New Industrial Permit"). These amendments became effective on July 1, 2015. All references to the General Industrial Permit are to the Permit as it existed at the time of the violations noted herein.

Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of RDS' Clean Water Act violations and CERF's intent to sue.

I. Citizen Groups

CERF is a non-profit public benefit corporation organized under the laws of the State of California with its main office in Encinitas, CA. CERF is dedicated to the preservation, protection, and defense of the environment, the wildlife, and the natural resources of the California Coast. CERF's mailing address is 1140 S. Coast Highway 101, Encinitas, CA 92024 and telephone number is 760-942-8505.

Members of CERF use and enjoy the waters into which pollutants from RDS' ongoing illegal activities are discharged, namely Santa Maria Creek, Santa Ysabel Creek, San Dieguito River, and eventually the Pacific Ocean (Receiving Waters). The public and members of CERF use these Receiving Waters to fish, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the RDS Facility affects and impairs each of these uses. Thus, the interests of CERF's members have been, are being, and will continue to be adversely affected by RDS Owners and/or Operators' failure to comply with the Clean Water Act and the Industrial Permit.

II. Storm Water Pollution and the General Industrial Permit

A. Duty to Comply

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the Industrial Permit in order to lawfully discharge.

RDS enrolled as a discharger subject to the Industrial Permit on October 30, 1996 for its RDS Facility located at 324 Maple Street, Ramona California 92065. RDS enrolled under the New Industrial Permit on June 26, 2015, WDID Number 9 37I012619. The RDS facility is a recycling facility, refuse transfer station, refuse collection truck yard, and household hazardous waste collection facility. (SWPPP, p. 3). The Facility SIC Code is 4953, Refuse Systems.

Pursuant to Section C(1) of the Industrial Permit, a facility operator must comply with all conditions of the Industrial Permit. (See New Industrial Permit, §I.A.8. [dischargers must "comply with all requirements, provisions, limitations, and prohibitions in this General Permit."]). Failure to comply with the Industrial Permit is a Clean Water Act violation. (Industrial Permit, § C.1; New Industrial Permit §XXI.A.). Any non-compliance further exposes an owner/operator to an (a) enforcement action; (b) Industrial Permit termination, revocation and re-issuance, or modification; or (c) denial of an Industrial Permit renewal application. As an enrollee, RDS has a duty to comply with the Industrial Permit and New Industrial Permit and is subject to all of the provisions therein.

B. Failure to Monitor and Report

The RDS Owners and/or Operators have failed to report all monitoring data as required under the Industrial Permit and New Industrial Permit. Sections B(5) and (7) of the Industrial Permit requires dischargers to visually observe and collect samples of storm water discharged from all locations where

storm water is discharged. Facility operators, including the RDS Owners and/or Operators, were required to collect samples from at least two qualifying storm events each wet season, including one set of samples during the first storm event of the wet season. Required samples were to be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility.

RDS became a member of the EDCO Material Recovery Facility (EDCO MRF) Compliance Group in September 2016. Under the New Industrial Permit, RDS was required to sample two qualifying storm events (QSE) during the first half of the reporting period, and two during the latter half until it enrolled in the EDCO MRF Compliance Group. (New Industrial Permit, §XI.B.2). Upon enrollment in the Compliance Group, RDS was required to sample one QSE during the first half of the reporting period and one during the latter half. (New Industrial Permit, §XI.B.3). RDS was also required to upload all monitoring data to SMARTS within 30 days of obtaining the results. (New Industrial Permit, §XI.B.11.a.).

Though the RDS Facility is part of the EDCO MRF Compliance Group, the RDS Owners and/or Operators failed to monitor two sampling events during the 2017-2018 reporting year. RDS also failed to sample two events during the 2014-2015 reporting year under the operative Industrial Permit. Thus, the RDS Owners and/or Operators are in violation of the monitoring requirements of the Industrial Permit and New Industrial Permit. The RDS Owners and/or Operators further failed to sample all discharge points as required. (New Industrial Permit, §XI.B.4.).

In addition, though the RDS Facility SWPPP, General Industrial Permit and New Industrial Permit require monitoring of fecal coliform and enterococcus, the RDS Owners and/or Operators have consistently failed to sample for bacteria since December 2016. (See SWPPP, Section 9.3.2, p. 25). The Facility also fails to monitor for Phosphorus based on a purported determination that this pollutant is not present at the facility. However, similarly situated refuse facilities routinely exhibit elevated levels of Phosphorus. Indeed, RDS maintained that Phosphorus was present at the Facility in its 2015-2016 Annual Report. The Facility likewise failed to monitor for lead, selenium and ammonia during the last monitored rain event in February 2018. Until recently, the Facility also failed to monitor for aluminum, zinc and copper, despite the fact that metals are present at the Facility. RDS also inexplicably discontinued sampling for iron until the most recent rain event. (SWPPP, pp. 9, 22-23). Lastly, on September 15, 2015, RDS used an improper analytical method for selenium that was not sensitive enough to measure compliance with the applicable NAL and/or water quality objective. Exceedance of the water quality objective is therefore presumed.

The RDS Owners and/or Operators had numerous opportunities to sample but failed to do so. (See Exhibit A). Every day the RDS Owners and/or Operators failed to adequately monitor the Facility is a separate and distinct violation of the Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). These violations are ongoing and the RDS Owners and/or Operators will continue to be in violation every day they fail to adequately monitor the Facility. The RDS Owners and/or Operators are thus subject to penalties in accordance with the Industrial Permit – punishable by a minimum of $37,500 per day of violations prior to November 2, 2015, and $51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

C. The RDS Facility Discharges Contaminated Storm Water in Violation of the Industrial Permit

The RDS Owners and/or Operators' monitoring reports indicate consistent exceedances and violations of the Industrial Permit. Discharge Prohibition A(2) of the Industrial Permit and New Industrial Permit Sections III.C-D prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance.

Effluent Limitation B(3) of the General Industrial Permit requires dischargers to reduce or prevent pollutants associated with industrial activity in storm water discharges through implementation of BMPs that achieve Best Available Technology Economically Achievable ("BAT") for toxic and non-conventional pollutants and Best Conventional Pollutant Control Technology ("BCT") for conventional pollutants. The New Industrial Permit includes the same effluent limitation. (*See* New Industrial Permit, Effluent Limitation V(A)).

Information available to CERF, including via review of publicly available information and observations, indicates BMPs that achieve BAT/BCT have not been developed and/or implemented at the Facility. Consistent with CERF's review of such information, the analytical results of storm water monitoring at the Facility demonstrate that the RDS's Owners and/or Operators have failed and continue to fail to develop and/or implement BAT/BCT and achieve compliance with BAT/BCT standards, as required. Specifically, the Facility discharges have exceeded EPA Benchmarks for numerous pollutants. EPA Benchmarks are relevant and objective standards for evaluating whether a permittee's BMPs achieve compliance with BAT/BCT standards as required by Effluent Limitation B(3) of the Industrial Permit and Effluent Limitation V(A) of the New Industrial Permit.

Receiving Water Limitation C(1) of the Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges which cause or contribute to an exceedance of any water quality standards or applicable Basin Plan water quality standards. (See New Industrial Permit Receiving Water Limitations VI.A-C). The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard. (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it 'causes or contributes to an exceedance of' such a standard, including the CTR." (*Id.* at 927).

If a discharger violates Water Quality Standards, the Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards.(Industrial Permit, Fact Sheet p. viii; 33 U.S.C. § 1311(b)(I)(C); New Industrial Permit, §XX.B.). The RDS Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Facility's SWPPP pursuant to Industrial Permit section (C)(3) and New Industrial Permit Section X.B.1.

As demonstrated by sample data submitted by RDS, from enrollment through the present, the RDS Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of water quality prohibitions and limitations during every significant rain event. The RDS Facility's sampling data reflects numerous discharge violations (see below). RDS' own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492, vacated by 485 U.S. 931, 108,

judgment reinstated in 853 F.2d 667 (9th Cir.1988) ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]). This data further demonstrates the RDS Facility continuously discharges contaminated storm water during rain events which have not been sampled.

No.	Monitoring Location Latitude	Monitoring Location Longitude	Date	Parameter	Result	Units	Benchmark/ WQO	Benchmark /NAL
1	33.044189	-116.875517	2/27/2012	Chemical Oxygen Demand (COD)	190	mg/L	120 mg/L	120 mg/L
2	33.044189	-116.875517	2/27/2012	Iron, Total	3.18	mg/L	0.3[1]	1
3	33.044153	-116.876531	2/27/2012	Iron, Total	1.32	mg/L	0.3[1]	1
4	33.044189	-116.875517	2/27/2012	Lead, Total	0.393	mg/L	0.065[2]	0.262
5	33.044189	-116.875517	2/27/2012	Total Suspended Solids (TSS)	169	mg/L	100	100
6	33.044153	-116.876531	2/27/2012	Total Suspended Solids (TSS)	129	mg/L	100	100
7	33.044189	-116.875517	12/13/2012	Iron, Total	1.77	mg/L	0.3[1]	1
8	33.044153	-116.876531	12/13/2012	Iron, Total	0.17	mg/L	0.3[1]	1
9	33.044153	-116.876531	12/13/2012	pH	6.16	SU	6.5-8.5	6.0-9.0
10	33.044189	-116.875517	12/13/2012	Total Suspended Solids (TSS)	119	mg/L	100	100
11	33.044153	-116.876531	3/8/2013	Iron, Total	0.71	mg/L	0.3[1]	1
12	33.044189	-116.875517	3/8/2013	Iron, Total	0.71	mg/L	0.3[1]	1
13	33.044153	-116.876531	3/8/2013	pH	6.24	SU	6.5-8.5	6.0-9.0
14	33.044189	-116.875517	3/8/2013	pH	6.24	SU	6.5-8.5	6.0-9.0
15	33.044153	-116.876531	2/28/2014	Chemical Oxygen Demand (COD)	149	mg/L	120 mg/L	120 mg/L
16	33.044189	-116.875517	2/28/2014	Electrical Conductivity @ 25 Deg. C	901	umhos/cm	200	200
17	33.044153	-116.876531	2/28/2014	Iron, Total	1.41	mg/L	0.3[1]	1
18	33.044189	-116.875517	2/28/2014	Iron, Total	0.41	mg/L	0.3[1]	1
19	33.044189	-116.875517	2/28/2014	Magnesium, Total	7.09	mg/L		0.064
20	33.044153	-116.876531	2/28/2014	Magnesium, Total	6.48	mg/L		0.064
21	33.044153	-116.876531	4/1/2014	Chemical Oxygen Demand (COD)	144	mg/L	120 mg/L	120 mg/L

No.	Monitoring Location Latitude	Monitoring Location Longitude	Date	Parameter	Result	Units	Benchmark/ WQO	Benchmark /NAL
22	33.044189	-116.875517	4/1/2014	Chemical Oxygen Demand (COD)	126	mg/L	120 mg/L	120 mg/L
23	33.044153	-116.876531	4/1/2014	Electrical Conductivity @ 25 Deg. C	447	umhos/ cm	200	200
24	33.044153	-116.876531	4/1/2014	Iron, Total	0.56	mg/L	0.3[1]	1
25	33.044189	-116.875517	4/1/2014	Iron, Total	0.38	mg/L	0.3[1]	1
26	33.044153	-116.876531	4/1/2014	Magnesium, Total	12.8	mg/L		0.064
27	33.044189	-116.875517	4/1/2014	Magnesium, Total	2.01	mg/L		0.064
28	33.044189	-116.875517	5/8/2015	Chemical Oxygen Demand (COD)	179	mg/L	120 mg/L	120 mg/L
29	33.044153	-116.876531	5/8/2015	Chemical Oxygen Demand (COD)	150	mg/L	120 mg/L	120 mg/L
30	33.044189	-116.875517	5/8/2015	Iron, Total	1.22	mg/L	0.3[1]	1
31	33.044153	-116.876531	5/8/2015	Iron, Total	0.54	mg/L	0.3[1]	1
32	33.044153	-116.876531	5/8/2015	pH	6.37	SU	6.5-8.5	6.0-9.0
33	33.044189	-116.875517	5/8/2015	Total Suspended Solids (TSS)	162	mg/L	100	100
34	33.044153	-116.876531	5/8/2015	Total Suspended Solids (TSS)	116	mg/L	100	100
35	33.044189	-116.875517	7/18/2015	Magnesium, Total	5.35	mg/L		0.064
36	33.044153	-116.876531	7/18/2015	Magnesium, Total	1.52	mg/L		0.064
37	33.044153	-116.876531	7/18/2015	Total Suspended Solids (TSS)	215	mg/L	100	100
38	33.044153	-116.876531	9/15/2015	Ammonia, Total (as N)	4	mg/L		2.14 mg/L
39	33.044153	-116.876531	9/15/2015	Chemical Oxygen Demand (COD)	630	mg/L	120 mg/L	120 mg/L
40	33.044153	-116.876531	9/15/2015	Magnesium, Total	14	mg/L		0.064
41	33.044189	-116.875517	9/15/2015	Magnesium, Total	9	mg/L		0.064
42	33.044153	-116.876531	9/15/2015	Selenium, Total	< 0.01	mg/L	0.005	0.005
43	33.044189	-116.875517	9/15/2015	Selenium, Total	< 0.01	mg/L	0.005	0.005
44	33.044153	-116.876531	9/15/2015	Total Suspended Solids (TSS)	250	mg/L	100	100

No.	Monitoring Location Latitude	Monitoring Location Longitude	Date	Parameter	Result	Units	Benchmark/ WQO	Benchmark /NAL
45	33.044153	-116.876531	1/5/2016	Chemical Oxygen Demand (COD)	1200	mg/L	120	120
46	33.044153	-116.876531	1/5/2016	Lead, Total	0.088	mg/L	0.065[2]	0.262
47	33.044153	-116.876531	1/5/2016	Magnesium, Total	14	mg/L		0.064
48	33.044189	-116.875517	1/5/2016	Magnesium, Total	2.1	mg/L		0.064
49	33.044153	-116.876531	1/5/2016	Total Suspended Solids (TSS)	1100	mg/L	100	100
50	33.044153	-116.876531	3/7/2016	Chemical Oxygen Demand (COD)	170	mg/L	120	120
51	33.044153	-116.876531	3/7/2016	Magnesium, Total	3.5	mg/L		0.064
52	33.044189	-116.875517	3/7/2016	Magnesium, Total	2.1	mg/L		0.064
53	33.044153	-116.876531	3/7/2016	Total Suspended Solids (TSS)	170	mg/L	100	100
54	33.044153	-116.876531	12/16/2016	Chemical Oxygen Demand (COD)	190	mg/L	120	120
55	33.044189	-116.875517	12/16/2016	Enterococci	>1600	MPN/100 mL	61	
56	33.044153	-116.876531	12/16/2016	Enterococci	>1600	MPN/100 mL	61	
57	33.044153	-116.876531	12/16/2016	Fecal Coliform	>1600	MPN/100 mL	400	
58	33.044189	-116.875517	12/16/2016	Fecal Coliform	>1600	MPN/100 mL	400	
59	33.044153	-116.876531	12/16/2016	Magnesium, Total	3.8	mg/L		0.064
60	33.044189	-116.875517	12/16/2016	Magnesium, Total	0.97	mg/L		0.064
61	33.044153	-116.876531	12/16/2016	Total Suspended Solids (TSS)	110	mg/L	100	100
62	33.044153	-116.876531	5/6/2017	Ammonia, Total (as N)	3.4	mg/L		2.14
63	33.044153	-116.876531	5/6/2017	Chemical Oxygen Demand (COD)	1900	mg/L	120	120
64	33.044189	-116.875517	5/6/2017	Chemical Oxygen Demand (COD)	150	mg/L	120	120
65	33.044153	-116.876531	5/6/2017	Magnesium, Total	31	mg/L		0.064
66	33.044189	-116.875517	5/6/2017	Magnesium, Total	5.1	mg/L		0.064

No.	Monitoring Location Latitude	Monitoring Location Longitude	Date	Parameter	Result	Units	Benchmark/ WQO	Benchmark /NAL
67	33.044153	-116.876531	5/6/2017	Oil and Grease	16	mg/L	15	15
68	33.044153	-116.876531	5/6/2017	Total Suspended Solids (TSS)	400	mg/L	100	100
69	33.044189	-116.875517	2/27/2018	Aluminum, Total	3.3	mg/L	.75	.75
70	33.044153	-116.876531	2/27/2018	Aluminum, Total	2.8	mg/L	.75	.75
71	33.044153	-116.876531	2/27/2018	Chemical Oxygen Demand (COD)	140	mg/L	120	120
72	33.044153	-116.876531	2/27/2018	Copper, Total	0.041	mg/L	.013[2]	.26
73	33.044189	-116.875517	2/27/2018	Copper, Total	0.023	mg/L	.013[2]	.26
74	33.044153	-116.876531	2/27/2018	Iron, Total	4.4	mg/L	0.3[1]	1
75	33.044189	-116.875517	2/27/2018	Iron, Total	1.8	mg/L	0.3[1]	1
76	33.044153	-116.876531	2/27/2018	Magnesium, Total	4.8	mg/L		0.064
77	33.044189	-116.875517	2/27/2018	Magnesium, Total	4.7	mg/L		0.064
78	33.044153	-116.876531	2/27/2018	Oil and Grease	19	mg/L	15	15
79	33.044153	-116.876531	2/27/2018	pH	6.45	SU	6.5-8.5	6.0-9.0
80	33.044189	-116.875517	2/27/2018	pH	6.33	SU	6.5-8.5	6.0-9.0
81	33.044189	-116.875517	2/27/2018	Total Suspended Solids (TSS)	330	mg/L	100	100
82	33.044153	-116.876531	2/27/2018	Total Suspended Solids (TSS)	190	mg/L	100	100
83	33.044153	-116.876531	2/27/2018	Zinc, Total	0.28	mg/L	0.12[2]	0.26
84	33.044189	-116.875517	2/27/2018	Zinc, Total	0.22	mg/L	0.12[2]	0.26

[1] Basin Plan Water Quality Objective for Santa Maria Valley and Santa Ysabel

[2] CTR based on 100 mg/L hardness

Further, the New Industrial Permit Effluent Limitation V(A) is an independent requirement of the Permit, and carrying out the iterative process triggered by exceedances of the Permit's Numeric Action Levels ("NALs") does not amount to compliance with Effluent Limitation V.A. Exceedances of the NALs demonstrate that a facility (such as the RDS Facility) is among the worst performing facilities in the State. Moreover, the NALs do not represent technology-based criteria relevant to determining whether an industrial facility has implemented BMPs that achieve BAT/BCT. Thus, even if the Facility Owners and/or Operators are engaged in the NAL iterative process and submit an Exceedance Response Action Plan under Section XII of the Permit, the violations of Effluent Limitation V(A) described herein are ongoing and continuous.

D. Inadequate Storm Water Pollution Prevention Plan

One of the central components of the Industrial Permit is the suite of Storm Water Pollution Prevention Plan (SWPPP) requirements. (Industrial Permit §A; New Industrial Permit §X.). RDS has not developed an adequate SWPPP as required by the Industrial Permit or New Industrial Permit, with many of the required elements noticeably absent from the RDS Facility SWPPP. (New Industrial Permit, §X.A.1-10).

The latest RDS SWPPP, dated 12/20/2016 fails to adequately assess the Facility's potential contribution of pollutants for which the Receiving Waters are impaired. For example, the SWPPP notes the Receiving Waters are impaired for Phosphorus, but summarily claims Phosphorus is not present at the Facility. However, RDS noted in its 2015-2016 Annual Report that Phosphorus is present at the Facility, and its List of Industrial Materials (Table II) notes detergents and solvents are used in large quantities at the Facility. (SWPPP, Section 3.1, p. 8). As a result, the SWPPP erroneously fails to require Phosphorus monitoring. (SWPPP, p. 26, Table V).

The SWPPP also fails to require monitoring of iron, copper and zinc, despite the SWPPP acknowledgement of the Facility's potential contribution of metals and despite the presence of such constituents in the Facility's most recent discharge samples. (See, SWPPP, pp. 9, 22-23, 26, Monitoring Results, February 27, 2018).

The latest SWPPP also fails to account for the numerous and repeated violations identified by RDS' monitoring data – ensuring these violations continue. The SWPPP is therefore inadequate. (See New Industrial Permit §I.E.37. ["Compliance with water quality standards may, in some cases, require Dischargers to implement controls that are more protective than controls implemented solely to comply with the technology-based requirements in this General Permit."]).

Every day the RDS Owners and/or Operators operate the Facility without an adequate SWPPP, is a separate and distinct violation of the General Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). The RDS Owners and/or Operators have been in daily and continuous violation of the General Industrial Permit and New Industrial Permit since at least December 12, 2012. These violations are ongoing and the RDS Owners and/or Operators will continue to be in violation every day they fail provide an adequate SWPPP for the Facility. Thus, the RDS Owners and/or Operators are liable for civil penalties of up to $37,500 per day of violations prior to November 2, 2015, and $51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

E. Inadequate Level 1 and 2 ERA Report

The Facility entered Level 1 status for TSS, magnesium and COD in 2016. The Level 1 ERA Report did not require filtration or other advanced BMPs. Rather, it relied on increased housekeeping and source control BMPs. Because the Facility's Level 1 Technical Report was inadequate, the Facility is now in Level 2 status for all three constituents. Accordingly, the Level 1 ERA Report fails to meet the requirements of Section XII(C) of the New Industrial Permit.

The Level 2 ERA Report is equally inadequate. First, it relies on demonstration projects at other facilities to determine BMP effectiveness at the RDS Facility. This is inappropriate – especially in light of the fact that such BMPs have proven ineffective at reducing contaminants at the chosen sites. In addition,

RDS's non-industrial pollutant source demonstration project at a *different facility* will not affirmatively establish the source of Magnesium at the RDS Facility. (Level 2 Report, p. 10). RDS's failure to take its Level 1 and 2 requirements seriously only further ensures the Facility will continue to exceed applicable NALs, Water Quality Standards, and benchmarks.

Every day the RDS Owners and/or Operators fail to submit an adequate Level 1 and 2 ERA Report is a separate and distinct violation of the Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). These violations are ongoing and the RDS Owners and/or Operators will continue to be in violation every day they fail to revise and submit an appropriate Level 1 and 2 ERA Report.

III. Remedies

Upon expiration of the 60-day period, CERF will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF is willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF will move forward expeditiously with litigation.

RDS must develop and implement an updated SWPPP, install BMPs to address the numerous and ongoing water quality violations, and implement a robust monitoring and reporting plan. RDS must also revise its Level 1 and 2 ERA Reports to address its numerous NAL exceedances. Should the RDS Owners and/or Operators fail to do so, CERF will file an action against RDS for its prior, current, and anticipated violations of the Clean Water Act. CERF will seek all remedies available under the Clean Water Act § 1365(a)(d), and the maximum penalty available under the law which is $37,500 per day for violations prior to November 2, 2015, and $51,570 per day for violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1). CERF may further seek a court order to prevent RDS from discharging pollutants.

Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF will seek to recover all of its costs and fees pursuant to section 505(d).

IV. Conclusion

CERF has retained legal counsel to represent it in this matter. Please direct all communications to CERF's legal counsel:

Marco Gonzalez
Livia Borak Beaudin
marco@coastlawgroup.com
livia@coastlawgroup.com
Coast Law Group, LLP
1140 South Coast Highway 101
Encinitas, California 92024
Tel: 760-942-8505

If you wish to pursue settlement discussions in the absence of litigation, please contact Coast Law Group LLP immediately.

Sincerely,

Marco Gonzalez
Livia Borak Beaudin
Attorneys for Coastal Environmental Rights Foundation

SERVICE LIST

VIA U.S. MAIL

Scott Pruitt
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Alexis Strauss
Acting Regional Administrator
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105

Eileen Sobeck
Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812–0110

David W. Gibson
Executive Officer
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, California 92108

Exhibit A. Precipitation Data

STATION	NAME	LATITUDE	LONGITUDE	ELEVATION	DATE	PRCP
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/21/2012	0.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/23/2012	0.37
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/7/2012	0.1
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/13/2012	0.16
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/14/2012	0.53
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/15/2012	0.32
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/27/2012	0.78
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/29/2012	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/17/2012	1.03
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/18/2012	0.61
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/19/2012	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/25/2012	0.29
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/26/2012	0.14
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/11/2012	0.28
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/13/2012	0.66
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/14/2012	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/26/2012	0.27
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	4/26/2012	0.33
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	9/11/2012	0.71
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/11/2012	0.49
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/12/2012	0.14
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	10/12/2012	0.67
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/8/2012	0.21
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/9/2012	0.18
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/9/2012	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/30/2012	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/13/2012	1.03
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/13/2012	0.72
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/14/2012	0.14
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/14/2012	0.17
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/15/2012	0.18
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/15/2012	0.42
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/18/2012	0.21
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/19/2012	0.26
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/24/2012	0.11
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/29/2012	0.28
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/30/2012	0.26
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/6/2013	0.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/25/2013	0.95
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/25/2013	0.41
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/26/2013	0.35
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/26/2013	0.79
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/27/2013	0.28
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/8/2013	0.23
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/10/2013	0.47
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/19/2013	0.44
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/20/2013	0.17
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/20/2013	0.73

Exhibit A. Precipitation Data

USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/7/2013	0.1
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/8/2013	1.12
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/8/2013	0.9
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/9/2013	0.19
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/9/2013	0.75
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/6/2013	0.31
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/7/2013	0.1
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/9/2013	1.07
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/28/2013	0.17
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/29/2013	0.34
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/21/2013	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/19/2013	0.69
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/19/2013	0.15
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/20/2013	0.66
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/24/2013	0.66
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/31/2014	0.17
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/31/2014	0.27
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/6/2014	0.12
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/7/2014	0.29
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/27/2014	0.21
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/28/2014	2.46
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/28/2014	0.6
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/1/2014	0.77
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/1/2014	1.86
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/2/2014	0.12
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/2/2014	0.48
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/27/2014	0.16
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/1/2014	0.34
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	4/1/2014	0.19
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/2/2014	0.12
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	4/2/2014	0.28
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/26/2014	0.51
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	4/26/2014	0.69
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	7/25/2014	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	8/3/2014	0.17
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	8/3/2014	0.27
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	9/8/2014	0.21
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/1/2014	0.51
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/1/2014	0.53
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/21/2014	0.36
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/21/2014	0.4
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/2/2014	0.62
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/3/2014	0.36
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/3/2014	0.98
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/4/2014	0.32
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/4/2014	0.48
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/12/2014	0.81
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/12/2014	0.25
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/13/2014	0.15

Exhibit A. Precipitation Data

US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/13/2014	0.73
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/16/2014	0.41
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/17/2014	0.5
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/17/2014	1.01
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/26/2014	0.13
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/30/2014	0.16
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/31/2014	0.27
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/31/2014	0.68
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/11/2015	0.56
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/11/2015	0.27
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/12/2015	0.28
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/26/2015	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/22/2015	0.26
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/23/2015	0.44
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/28/2015	0.12
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/1/2015	0.87
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/1/2015	1
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/2/2015	0.36
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/2/2015	0.31
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/3/2015	0.37
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/24/2015	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/25/2015	0.28
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	4/26/2015	0.24
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/8/2015	0.66
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	5/8/2015	0.31
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/14/2015	0.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/15/2015	0.45
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	5/15/2015	0.72
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	5/21/2015	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	6/30/2015	0.23
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	7/1/2015	0.21
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	7/18/2015	1.25
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	7/19/2015	1.13
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	7/19/2015	0.6
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	7/20/2015	2.6
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	9/15/2015	1.29
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	9/16/2015	2.02
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/4/2015	0.29
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/5/2015	0.19
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	10/6/2015	0.78
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	10/21/2015	0.13
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/2/2015	0.23
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/3/2015	0.36
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/4/2015	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/15/2015	0.19
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/16/2015	0.33
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/25/2015	0.17
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/25/2015	0.14
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/27/2015	0.19

Exhibit A. Precipitation Data

USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/11/2015	0.2
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/11/2015	0.12
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/13/2015	0.27
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/13/2015	0.41
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/14/2015	0.42
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/19/2015	0.15
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	12/20/2015	0.17
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/22/2015	0.78
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/23/2015	0.12
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/28/2015	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/5/2016	2.33
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/6/2016	1.39
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/7/2016	1.72
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/31/2016	1
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/1/2016	1.08
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/18/2016	0.1
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/6/2016	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/7/2016	0.61
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/7/2016	0.45
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/8/2016	0.36
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/11/2016	0.34
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/30/2016	0.13
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/31/2016	0.12
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/7/2016	0.16
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/8/2016	0.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/9/2016	0.11
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/10/2016	0.6
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	4/10/2016	0.33
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	4/11/2016	0.28
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/6/2016	0.23
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	5/6/2016	0.51
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	5/15/2016	0.13
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	9/20/2016	0.27
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	9/20/2016	0.25
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	9/21/2016	0.23
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	9/21/2016	0.51
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	10/24/2016	0.16
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	10/25/2016	0.35
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/20/2016	0.1
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/21/2016	0.43
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/26/2016	0.66
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/26/2016	0.72
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	11/27/2016	0.24
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/27/2016	0.63
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	11/28/2016	0.13
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/15/2016	0.38
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/16/2016	1.57
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/21/2016	0.75
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/22/2016	0.66

Exhibit A. Precipitation Data

USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/23/2016	0.17
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/24/2016	0.97
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/30/2016	0.2
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	12/31/2016	0.69
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/5/2017	0.16
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/9/2017	0.29
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/9/2017	0.53
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/11/2017	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/12/2017	0.28
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/12/2017	0.15
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/13/2017	0.65
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/13/2017	1.03
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/19/2017	1.1
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/19/2017	1.68
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/20/2017	2.24
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/20/2017	0.8
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/22/2017	1.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/23/2017	1.2
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/23/2017	2.04
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/24/2017	0.4
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/6/2017	0.16
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/7/2017	0.33
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/7/2017	0.84
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/11/2017	0.15
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/12/2017	0.24
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/17/2017	0.88
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/18/2017	0.36
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/18/2017	0.75
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/19/2017	0.12
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/21/2017	0.46
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/27/2017	5.05
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/27/2017	0.82
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/6/2017	0.2
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	5/7/2017	0.91
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	8/1/2017	0.17
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/8/2018	0.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	1/9/2018	3.06
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/9/2018	1.8
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	1/10/2018	1.23
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/23/2018	0.14
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	2/27/2018	0.59
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	2/27/2018	0.61
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/10/2018	0.6
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/11/2018	0.94
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/14/2018	0.18
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/15/2018	0.22
USW00053120	RAMONA AIRPORT, CA US	33.0375	-116.91583	424.6	3/17/2018	0.24
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/17/2018	0.24
US1CASD0072	RAMONA 3 ENE, CA US	33.0507	-116.8278	620	3/23/2018	0.15